



## Westlands Water District

3130 N. Fresno Street, P.O. Box 6056, Fresno, California 93703-6056, (559) 224-1523, FAX (559) 241-6277

July 22, 2005

Paul Dabbs  
Statewide Planning Branch  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001  
[pdabbs@water.ca.gov](mailto:pdabbs@water.ca.gov)

SUBJECT: California Water Plan Update 2005 Comments

Dear Mr. Dabbs:

Westlands Water District (Westlands) appreciates the opportunity to comment on the California Water Plan Update 2005 (Plan) with the hope that its comments will make the Plan more useful and applicable to the needs of the State and the Department of Water Resources (Department). Westlands has divided its comments into three sections: General Comments which apply to the entire document, Plan Format which address how the layout, figures, etc. of the report could change, and finally Specific Comments which address identified sections and pages within the Plan.

### General Comments

- 1) Westlands strongly believes that new storage is imperative to the long term water needs and water balance for the State. The Plan, and for that matter, the State have capitulated to the CalFed program instead of taking a leadership role in identifying the needs within the State and current and future anticipated shortfalls. Westlands has idled approximately 100,000 acres, more than 20% of the district annually, due to lack of water supply. The only way that this land can be brought back into production is through new storage and water supplies. Absent new storage, other agricultural areas of the State will suffer the same fate as Westlands.
- 2) The Plan relies too much on the contribution of agricultural water efficiency towards meeting the existing and future shortfall in the State's water needs. In many areas, agriculture has met the water efficiency targets set by either the Bureau of Reclamation through Best Management Practices (BMP's) or through CalFed's

Quantifiable Objectives (QO's). In other areas where agricultural water efficiencies are below targets, the water supply that is not beneficially used by the crops often results in direct groundwater recharge, and since the Plan has identified groundwater overdraft in many areas as a concern, this type of recharge should be encouraged. Accordingly, agricultural water use efficiency is not the "silver bullet" towards meeting the State's water needs.

- 3) Prior to the Plan being finalized, the Department must complete the assessment for water needed for the provision of food and fiber to the population as mandated by State law.
- 4) The Plan indirectly relies upon market based forces and solutions in the allocation of water supplies to make up the current and future shortfall in meeting demands of the State. This will likely result in a net shift of water from agriculture to either the environment or municipal and industrial (M&I) uses, which will result in more agricultural lands going out of production. This needs to be accounted for in the analysis required in Comment #3 above. Additionally, the export of water supplies from the agricultural areas needs to be better analyzed and detailed in the Regional Reports.
- 5) The Plan fails to identify the fragile relationship of the Department as a planning agency and also as the operator of the State Water Project (SWP). For the market forces mentioned in Comment #4 above to work, for water transfers to occur to meet the shortfalls in the State, and for environmental needs to be addressed, the Department is often responsible for reviewing and/or approving transfers and conveyance of water supplies, especially through the SWP Banks Pumping Plant. However, at times, the Department is conflicted. The Plan needs to address how the Department will be able to provide leadership in the area of water transfers and also to make available conveyance capacity through State facilities as required by the Water Code.

#### Plan Format

- 6) The California Water Plan Highlights, A Framework for Action, incorporates charts and graphs that are extremely difficult to read, understand, and interpret.
  - a) The California Water Balance, shown on page 2, is difficult to read, has colors that are too similar, and the 3-dimensional chart makes it difficult to determine actual values for each legend item. A simple two 2-dimensional chart would be easier to interpret.
  - b) The 2030 Water Demand Changes by Scenario, pages 4 and 5, is impossible to understand and seems to be designed on purpose to be misleading. It's difficult to understand what is trying to be conveyed and it's very likely the general public (which the document is supposedly targeted) could not make sense of the information being presented. The Department should reconsider how this information is presented.

- c) The Bulletin 160 Advisory Committee provided comments to the Department on areas of agreement and disagreement within the Plan. These comments should be included in the Highlights so that those reading the document will be able to understand how information was assimilated and priorities set within the Plan by the Department and the Advisory Committee.

7) The California Water Plan Update 2005.

- a) The layout of "boxes" within the document is confusing. For example, will there be boxes in the current location or will the information be referenced to end of each chapter? Currently, the layout results in having page flip back and forth to understand the flow of the document.
- b) While the Highlights document has several charts and graph to help illustrate information being presented albeit confusing, there are relatively few charts, graphs, and maps within the Plan itself.

Specific Comments

8) Chapter 2 – A Framework for Action

- a) The Foundational Actions, page 2-3, ignore the issue of water supply and maximizing the State's abundant natural resources that could be put to beneficial use. The foundational base is the water resource itself, which is captured, stored, conveyed, pumped, utilized and managed for the public good. Efficiency, quality, and stewardship are sound management practices; however, growth and development need to be considered unless the goal is for maintaining the status quos only. Believing that infrastructure and storage is overly developed and that efficiency, quality, and stewardship alone will solve California's water needs out to 2030 is flawed and a plan for failure.

The concept of integrated regional water management plans to help protect the environment and control urban growth should also allow for the strategies to maximize the State's water resources. As currently presented, the plans focus more on issues within the regional setting and not on how to maximize the State's water resources outside of that region. From a regional perspective, the primary purpose of integrated management is to provide for current and projected uses, while protecting the environment and the resource concurrently. Yet, not all regions have the same needs and assets for water resources and a balanced strategy would address this key issue in the foundation. Is there adequate water supply for the State by region if focused only on efficiency, quality, and stewardship alone? Chapter 2 does not directly address this question. Issues of supply and demand are lost in a strategy with a preconceived assertion no additional water supplies are needed.

The strategy assumes that the foundational actions will provide for maximum benefit by region in the State, but does not answer how to bring about balance. It suggests that regions must do everything they can before carefully planned new

water developments will be contemplated by the State. It is also too simplistic and too vague with respect to how excess water resources in one region can meet the demands in another region. If the Department and State are to assume leadership, the Plan should include information on how the supplies could be balanced.

- b) The State should evaluate with greater scrutiny the biological effectiveness of regulations imposed on the Delta and have more confidence that such regulations are actually providing the benefit as expected. The Plan should seek more flexibility in regulations which fail to show any true discernable scientifically supported results. Environmental stewardship requires those agencies entrusted with water resources of the State to be just as accountable for its proven beneficial use. The State should be at the forefront of challenging regulations that have very large water costs without demonstrable benefits, such as X2, VAMP ramping flows, and other regulatory activities. Failure to address these issues in the Plan bypasses the purpose of the document.
  - c) The First Initiative explains the need for Integrated Regional Water Management, but near term actions to implement and integrate water supplies is weak on evaluation and supporting analysis. It states that regions cannot meet all their water objectives with a single strategy and recognizes that groundwater and surface water storage varies from region to region. This is a basic and fundamental observation. Regions that are water short can do all the planning, managing, integrating, efficiency, conservation, contingencies, maintenance, and still be short water in wet or dry years. DWR states it will work with possible means of sharing storage capacity among regions without any detail in Volume 1 on how to accomplish this among State, Federal, and private water purveyors.
  - d) The Second Initiative recognizes the need for additional groundwater and surface storage capacity in some regions for operational flexibility. The Near-term Actions to Implement Initiative 2 state: *"Water storage needs should be considered from a more local perspective in integrated regional water management plans to more accurately account for regional conditions."* The inference is that existing storage facilities should be shared among regions, but that any new storage capacity should only be built to meet local needs leaving out the possibility of integrating storage with other regions. The Plan needs to take a more assertive role in water storage development and how that supply will meet the demands within regional water management plans.
- 9) Chapter 3 – California Water Today
- a) Page 3-7 discusses notable changes since the 1987-1992 drought. The list should also include the passage of the Central Valley Project Improvement Act requiring the CVP to reprioritize operations and dedicate water for environmental purposes. In addition, ESA protections were added in the delta which added to the amount of water used for the environment.

- b) Page 3-11 discussed the relationship of Water and Energy. Absent from the discussion is that as the Plan reinforces the need for more water conservation, there will be an additional need for energy in the State. For example, as agricultural irrigation converts from lower efficient gravity systems to pressurized high efficient systems such as sprinklers, drip, or microspray, there will be an increase in energy needs. This should be addressed in the Plan.

10) Chapter 4 – Preparing for an Uncertain Future

- a) Figure 4-4 and other similar graphs poorly display information and provide little or no reference to understand what values are represented by region and scenarios. See Comment #6.
- b) Figure 4-4 shows that water demand changes from 2000 through 2030. The figure can be interpreted that under all three scenarios the entire State's reduction in water use occurs in the Tulare Lake Hydrologic Region. The prediction is for a 5% reduction in planted acreage coupled with 4.3 to 9.3 percentage increases in efficiency. The strategy then assumes that 2 million acre feet of surface water would become available for a similar amount of urban demand increases. Volume 3 Chapter 8 provides no supporting data readily available to neither confirm these numbers nor can it infer that increases in water efficiency would lead to additional water sales or exports from the Tulare Region. Further, the report simultaneously calls for an additional 2 million acre-feet of water per year needed by 2030 to stop ground water overdraft statewide. The assumption is that the Tulare Lake Region will be giving up surface water for use throughout the entire state to meet increased urban demand while reducing groundwater use through 2030. This south delta region has already given up a similar amount of surface water under CVPIA, the Bay-Delta Accord, and actions taken by the State Water Resources Control Board. This is a severely flawed strategy that ignores water rights, CVP and SWP contract deliveries, free and open water market forces, the national and international Agriculture markets and exports, and many other factors.
- c) Page 4-15 states that agricultural water demand was lower in 2000 because crop water was reduced by 9.3% and 4.3% respectively. However, this information doesn't appear to match the values shown in Table 4-3 under effective crop water use.
- d) Page 4-27 states that reductions in snow pack may require changes in the operation of California's water systems and infrastructure, and increase the value of additional flood control space in reservoirs. To compensate for additional flood control space, it will be necessary to expand storage in existing reservoirs or build new storage in order to maintain the same project yield. Absent this action, water will be shifted to environmental uses as water is released from reservoirs and deliveries to water users will be impaired.

11) Chapter 5 – Implementation Plan

- a) There is nothing in the implementation plan that correlates with the water use preparation scenarios specified in Chapter 4. It is assumed that the Integrated Water Management Plans will identify water supplies that would be available that could be exported to other regions to meet unmet water demands. Neither Recommendation 1 or 2 calls out specifically for more storage capacity. Recommendation 2 has an action plan to possibly share storage capacity, but with no practical analysis in Chapter 4.
- b) Under Recommendation 6, none of the actions directly address the need to plan for the orderly development of water supplies to meet consumptive uses. Instead, the recommendations suggest the State will only do such water planning to the extent it leads to restoration and protection of watersheds and assess in stream flow demands needed to protect ecosystems.

12) Volume 2 – Resource Management Strategies – Chapter 3. Agricultural Water Use Efficiency

- a) Table 1 identifies irrigation methods and use within the State. It would also be interesting for the table to include the average cost per acre-foot of water being applied through these systems to better understand the incentive water users have to use water more efficiently based on the respective cost of their water supply. Additionally, the table should show by region the types of irrigation methods used. For the Tulare Lake Region, much of the acreage is already irrigated using more efficient systems, yet the Plan (Figure 4-4) continues to show there is excess water available to be transferred out of this region to other regions through the use of more efficient irrigations systems. This is misleading and needs to be addressed.
- b) This chapter should also include a discussion on the energy needs of the State that will be required as more efficient irrigation systems are installed.

13) Volume 2 – Resource Management Strategies – Chapter 5. Conveyance

- a) On Page 5-5, there is a discussion on regulatory compliance. This section also needs to discuss the relationship of the Department as an approving agency and the Department as owner of a conveyance facility. See Comment #5.

14) Volume 2 – Resource Management Strategies – Chapter 17. Surface Storage - CALFED

- a) As mentioned in Comment #1, the Department and the Plan needs to take a more active role in the development of surface water storage. To simply leave any discussion and action to CalFed insures that there will be little accountability for progress on storage projects.

15) Volume 2 – Resource Management Strategies – Chapter 23. Water Transfers

- a) Page 23-2 states that the bulk of the increase in transfers is destined for farmers in the San Joaquin Valley and Tulare Basin. Figure 4-4 shows that there is

excess water that could be exported from the basin which seems to conflict with the statement on page 23-2.

- b) On Page 23-10, the Plan defers to CalFed's Water Transfer Program to gain consensus on how best to implement water transfers. The Plan should be more specific on how transfers will be used to balance the State's supply and demand needs, and further, the Plan should describe how the process will insure that water transfers can be done in a timely manner. The Plan is too general in its recommendations and needs to outline a process that the Department will be committed to.

16) Volume 3 – Regional Reports – Chapter 8. Tulare Lake Hydrologic Region

- a) Figure 8-3 and 8-4 are difficult to read in 3-dimensional format, they should be reformatted so that the values can be better determined.
- b) Table 8-1 provides a general water balance for the region with total storage changes in the region. It is unclear how this information and Figure 4-4 are related. Table 8-1 shows that there is an annual negative change in storage for the normal and dry years and Figure 4-4 shows that there is a negative demand (excess supply) available under each resource evaluation. It doesn't make sense.
- c) Westlands would appreciate the Department holding a workshop with the water users within the Tulare Lake region to discuss how the water balance was determined and what assumptions are built into the water balance model.

Westlands appreciates the opportunity to comment on this Plan. If you have any questions, please contact Jim Snow at (916) 321- 4519 or myself at (559) 241-6215.

Sincerely,

A handwritten signature in black ink, appearing to read "Thaddeus L. Bettner". The signature is fluid and cursive, with the first name being the most prominent.

Thaddeus L. Bettner  
Deputy General Manager – Resources